

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
CRAIG GORDON, Individually and on Behalf	:
of All Others Similarly Situated,	: No. 1:18-cv-07143-JFK
	:
Plaintiff,	: CLASS ACTION
	:
vs.	:
	:
NIELSEN HOLDINGS PLC, DWIGHT	:
MITCHELL BARNES and JAMERE	: STIPULATED ORDER
JACKSON,	:
	:
Defendants.	:
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Subject to the approval of the Court, plaintiff Craig Gordon (“Plaintiff”) and defendants Nielsen Holdings plc, Dwight Mitchell Barnes, and Jamere Jackson (collectively, “Defendants”), through their undersigned attorneys, stipulate and agree as follows:

WHEREAS, on August 8, 2018, Plaintiff filed a Class Action Complaint alleging violations of federal securities laws captioned *Craig Gordon, Individually and on Behalf of All Others Similarly Situated vs. Nielsen Holdings plc, Dwight Mitchell Barnes and Jamere Jackson*, Case No. 1:18-cv-07143-JFK;

WHEREAS, Defendants have either been served with process or their undersigned counsel, who are authorized to accept service, hereby accept service of the summons and complaint in the above-captioned action on their behalf, without prejudice and without waiver of any of Defendants’ defenses, objections, or arguments in this matter or any other matter, except as to sufficiency of service of process;

WHEREAS, this putative class action asserts federal securities claims arising under the Securities Exchange Act of 1934, which is governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). *See* 15 U.S.C. § 78u-4 *et seq.*;

WHEREAS, the PSLRA provides for consolidation of all related actions and the appointment of a lead plaintiff and lead counsel, after a 60-day notice period expires following the publication of notice of the filing of an initial securities class action. *See* 15 U.S.C. § 78u-4(a)(3);

WHEREAS, motions for the appointment as lead plaintiff and for approval of the lead plaintiff’s selection of lead counsel are not due in this matter until October 8, 2018;

WHEREAS, lead plaintiff and lead counsel will not be appointed until after the completion of briefing on any lead plaintiff motions, and accordingly it is unclear at this time who will ultimately have the authority to act on behalf of Plaintiff and the putative class, and whether the court-appointed lead plaintiff will file a consolidated or amended complaint, or stand on the existing complaint filed herein; and

WHEREAS, no party has previously requested or received time for an extension to answer or otherwise plead to the complaint in the above-captioned action;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff and Defendants, that:

1. Following appointment by the Court, the lead plaintiff must file a consolidated or amended complaint, or give written notice to Defendants that the lead plaintiff has elected to stand on the original complaint, no later than sixty (60) days after entry of the Court’s order appointing lead plaintiff and lead counsel.

2. The time for Defendants to move, answer, or otherwise respond to the complaint is extended until sixty (60) days after the consolidated or amended complaint is filed or the lead plaintiff gives notice to Defendants that it has elected to stand on the original complaint.

3. If Defendants elect to file motions to dismiss, the lead plaintiff shall file its opposition to those motions no later than sixty (60) days after they are filed.

4. Defendants shall file replies in further support of any motions to dismiss no later than thirty (30) days after the lead plaintiff files its opposition.

IT IS ON THIS _____ day of _____, 2018 so Ordered:

By: _____
The Honorable John F. Keenan

By: 

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